

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**NETTIE Y. DAVIS**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NUMBER 3:21-cv-616-DPJ-FKB**

**MICHAEL WATSON, Secretary of State of the  
State of Mississippi, in His Individual and Official Capacities**

**DEFENDANT**

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**DEFENDANT MICHAEL WATSON'S  
MOTION TO EXPEDITE MOTION TO STAY PROCEEDINGS**

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COMES NOW Defendant, Michael Watson, Secretary of State of the State of Mississippi, in his individual and official capacities (hereafter "Secretary Watson"), and requests that the Court expedite consideration of, and its ruling on Secretary Watson's Motion to Stay Proceedings.

1. Plaintiff Nettie Davis filed this action on September 1, 2021, see Doc. No. 1-1. The Case Management Conference in this matter is scheduled for November 4, 2021. Doc. No. 3.

2. On October 18, 2021, Secretary Watson filed a motion to stay all proceedings in this matter due to Plaintiff's unresolved, related criminal charges. Doc. No. 5. Because the Case Management Conference is scheduled for November 4, 2021, Secretary Watson requests the Court place the motion to stay on an expedited track. In the alternative, Secretary Watson requests the Case Management Conference be rescheduled to a date after the Court rules upon the motion to stay.

3. Given the nature of this motion, Secretary Watson requests that any requirement of a separate memorandum in support be waived.

For these reasons, it is requested that the Court place Secretary Watson's motion to stay proceedings on an expedited track or, in the alternative, reschedule the Case Management Conference until a date after the Court rules on the motion to stay.

THIS the 18<sup>th</sup> day of October, 2021.

Respectfully submitted,

MICHAEL WATSON, SECRETARY OF STATE  
OF THE STATE OF MISSISSIPPI, IN HIS  
INDIVIDUAL AND OFFICIAL CAPACITIES,  
DEFENDANT

By: LYNN FITCH, ATTORNEY GENERAL  
STATE OF MISSISSIPPI

By: s/Gerald L. Kucia  
GERALD L. KUCIA (MSB #8716)  
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WATSON, SECRETARY OF STATE  
OF THE STATE OF MISSISSIPPI,  
IN HIS INDIVIDUAL AND OFFICIAL  
CAPACITIES

**CERTIFICATE OF SERVICE**

I, Gerald L. Kucia, Special Assistant Attorney General and attorney for Defendant Michael Watson, Secretary of State of the State of Mississippi, in his Individual and Official Capacities, do hereby certify that I have this date served the foregoing pleading by United States Mail to the following:

Jim Waide, Esq.  
Waide and Associates, P.A.  
Post Office Box 1357  
Tupelo, Mississippi 38802-1357  
*Attorney for Plaintiff*

THIS the 18<sup>th</sup> day of October, 2021.

s/Gerald L. Kucia  
GERALD L. KUCIA